

ROTHENBERG & CAMPBELL

Ryan P. Campbell, Esq. (#317838)
 Dave W. Rothenberg, Esq. (#326483)
 345 Wyoming Avenue, Suite 210
 Scranton, Pennsylvania 18503
 Phone: 570.207.2889 || Fax: 570.207.3991
 E-mail: Hrlaw04@gmail.com || Hrlaw06@gmail.com

Attorneys for the Defendants

**IN THE UNITED STATES DISTRICT COURT
 FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<p>PHILIP GODLEWSKI,</p> <p style="text-align: right;">Plaintiff,</p> <p>v.</p> <p>EDUARDO NICOLAS ALVEAR GONZALEZ, <i>AKA</i> ALVEAR GONZALEZ EDUARDO NICOLAS, <i>AKA</i> NICOLAS ALVEAR; and GOOD LION TV, LLC,</p> <p style="text-align: right;">Defendants</p>	<p>CIVIL ACTION—LAW & EQUITY <i>(HON. JULIA K. MUNLEY)</i></p> <p>JURY TRIAL DEMANDED</p> <p>No.: 3:24—CV—00344—JKM</p>
--	--

**DEFFENDANTS' MOTION FOR AUTHORIZATION TO FILE BRIEF
 NOT TO EXCEED 8,500 WORDS PURSUANT TO LOCAL RULE 7.8(b)(3)**

AND NOW COME Defendants, Eduardo Nicolas Alvear Gonzalez, *aka* Alvear Gonzalez Eduardo Nicolas, *aka* Nicolas Alvear (collectively, “Individual Defendant”) and Good Lion TV, LLC (“Corporate Defendant”), by and through their counsel, Rothenberg & Campbell, and hereby moves this Honorable Court to authorize them to file a Brief in Support of their Motion to Dismiss First Amended Complaint Not to Exceed 8,500 words pursuant to Local Rule 7.8(b)(3), alleging as follows:

1. Plaintiff commenced the instant action by filing a Complaint against Defendants in the United States District Court for the Middle District of Pennsylvania on February 28, 2024. (See ECF Doc. No. 2).
2. On March 27, 2024, undersigned counsel entered his appearance for Individual Defendant and Corporate Defendant, having just been retained earlier that day by Defendants. (See ECF Doc. No. 11).
3. On April 4, 2024, Defendants filed their Motion to Dismiss Plaintiff's Complaint pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), and, Alternatively, Motion to Strick pursuant to Rule 12(f) ("First Motion to Dismiss"). (See ECF Doc. No. 16).
4. On or about April 6, 2024, this Honorable Court granted Plaintiff's Motion for Authorization to File Brief Not to Exceed 8,500 Words Pursuant to L.R. 7.8(b)(3) regarding the First Motion to Dismiss. (See ECF Doc. Nos. 17 and 18, *respectively*).
5. On April 25, 2024, Plaintiff filed a First Amended Complaint with this Honorable Court, rendering Defendants' April 4, 2024 Motion to Dismiss moot. (See ECF Doc. Nos. 22 and 23, *respectively*).
6. Defendants intend on filing a Motion to Dismiss First Amended Complaint Pursuant to Fed. R. Civ. P. 12(b)(6), in Whole or in Part, and, if Granted in Part, Motion to Dismiss Remaining Claims Pursuant to Fed R. Civ. P. 12(b)(1) ("Second Motion to Dismiss").
7. As of the date of this Motion, Defendants' Brief in Support of their Second Motion to Dismiss exceeds the word limit announced in Local Rule 7.8(b) with its current draft containing just under 9,000 words.

8. Defendants again seek authorization from this Honorable Court pursuant to Local Rule 7.8(b)(2) to file their Brief in Support of Second Motion to Dismiss with a word count not to exceed 8,500 words.

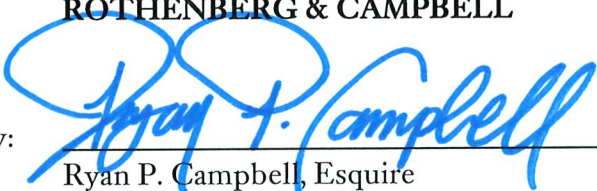
9. On May 7, 2024, Defendants' undersigned counsel contacted counsel for Plaintiff seeking concurrence in the instant motion for prior authorization to file their brief with a word count not to exceed 8,500 words; Plaintiff's counsel later concurred in his request.

WHEREFORE, for all of the reasons stated supra, Defendants, Eduardo Nicolas Alvear Gonzalez, *aka* Alvear Gonzalez Eduardo Nicolas, *aka* Nicolas Alvear, and Good Lion TV, LLC, by and through undersigned counsel, respectfully request that this Honorable Court **GRANT** their Motion for Authorization to File Brief Not to Exceed 8,500 Words Pursuant to Local Rule 7.8(b)(3).

Respectfully Submitted,

ROTHENBERG & CAMPBELL

By:


Ryan P. Campbell, Esquire
345 Wyoming Ave., Ste. 210
Scranton, PA 18503
p. 570.207.2889 || e. HRLaw04@gmail.com

ATTORNEYS FOR DEFENDANTS

Date: May 7, 2024

ROTHENBERG & CAMPBELL

Ryan P. Campbell, Esq. (#317838)

Dave W. Rothenberg, Esq. (#326483)

345 Wyoming Avenue, Suite 210

Scranton, Pennsylvania 18503

Phone: 570.207.2889 || Fax: 570.207.3991

E-mail: Hrlaw04@gmail.com || Hrlaw06@gmail.com

Attorneys for the Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

PHILIP GODLEWSKI,

Plaintiff,

v.

**EDUARDO NICOLAS ALVEAR
GONZALEZ, AKA ALVEAR GONZALEZ
EDUARDO NICOLAS, AKA
NICOLAS ALVEAR; and
GOOD LION TV, LLC,**

Defendants

**CIVIL ACTION—LAW & EQUITY
(HON. JULIA K. MUNLEY)**

JURY TRIAL DEMANDED

No.: 3:24—CV—00344—JKM

CERTIFICATE OF CONCURRENCE

I, Ryan P. Campbell, Esquire, on behalf of Defendants, do hereby certify that I sought concurrence in Defendants' Motion for Authorization to File Brief Not to Exceed 8,500 Words Pursuant to Local Rule 7.8(b)(3) to Plaintiff's counsel, Timothy M. Kolman, Esq. by e-mail on May 7, 2024 and that Plaintiff's counsel has no objection to the instant motion.

BY: **ROTHENBERG & CAMPBELL**



Ryan P. Campbell, Esquire

ATTORNEYS FOR DEFENDANTS

Date: May 7, 2024

ROTHENBERG & CAMPBELL

Ryan P. Campbell, Esq. (#317838)

Dave W. Rothenberg, Esq. (#326483)

345 Wyoming Avenue, Suite 210

Scranton, Pennsylvania 18503

Phone: 570.207.2889 || Fax: 570.207.3991

E-mail: Hrlaw04@gmail.com || Hrlaw06@gmail.com

Attorneys for the Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

PHILIP GODLEWSKI,

Plaintiff,

v.

**EDUARDO NICOLAS ALVEAR
GONZALEZ, AKA ALVEAR GONZALEZ
EDUARDO NICOLAS, AKA
NICOLAS ALVEAR; and
GOOD LION TV, LLC,**

Defendants

CIVIL ACTION—LAW & EQUITY
(*HON. JULIA K. MUNLEY*)

JURY TRIAL DEMANDED

No.: 3:24—CV—00344—JKM

CERTIFICATE OF SERVICE

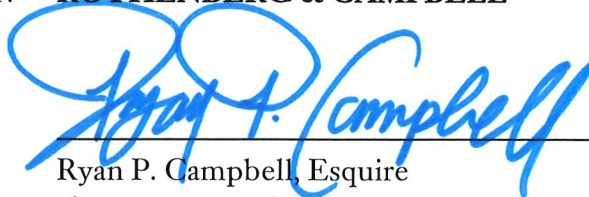
I, Ryan P. Campbell, Esquire, on behalf of Defendants, do hereby certify that I sent a true and accurate copy of Defendants' Motion to Extend Deadlines in the above-captioned case on this **7th day of May, 2024** to the below named individuals by ECF and Electronic Mail addressed as follows:

Timothy M. Kolman, Esq.

e. tkolman@kolmanlaw.com

ATTORNEYS FOR PLAINTIFF

BY: **ROTHENBERG & CAMPBELL**



Ryan P. Campbell, Esquire

ATTORNEYS FOR DEFENDANTS

DATE: MAY 7, 2024